

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Plaintiffs,

V.

Defendant(s).

NOTE DATE:
March 24, 2023

1 I, Shounak S. Dharap hereby declare as follows:

- 2 1. I am an attorney licensed to practice before all the courts of the State of California
3 and a partner at The Arns Davis Law Firm, where I currently lead the complex
4 litigation practice area. I make this Declaration in support of Plaintiffs' Motion for
5 Class Certification (the "Motion").
- 6 2. The Arns Davis Law Firm has considerable experience in litigating complex cases.
7 We have litigated numerous other state and federal class actions, including
8 numerous wage and hour class actions involving misclassification and hourly
9 workers. The Arns Davis Law Firm has been appointed as class counsel in
10 multiple actions, including:
 - 11 a. *Blau v. Dollar Financial (We the People)*, Alameda Superior Court,
12 Case No. RG07347097
 - 13 b. *Torres v. North Pacific Seafoods Inc.*, United States District Court for
14 the Western District of Washington, No. 2:20-cv-01545-JLR
 - 15 c. *Estela Ruiz v. Jack in the Box Inc.*, Alameda County Superior Court,
16 Case No. RG168007477
 - 17 d. *Homer Reyes and Isidro Echeverria v. Floormasters, Inc.*, Alameda
18 County Superior Court, Case No. RG13702584
 - 19 e. *Camp v. Instacart*, Los Angeles Superior Court, Case No. BC652216
 - 20 f. *Thomas Harold MacRae v. Manor Care Services*, United States District
21 Court for the Central District of California Southern Division, Case No. SA
22 CV 14-00715-DOC (RNBx)
 - 23 g. *Hazel Walsh v. Kindred Healthcare*, United States District Court for
24 the Northern District of California, No. C 11-00050 JSW
 - 25 h. *Blue Shield of California Affordable Care Act Cases*, San Francisco
26 County Superior Court, Case No. CJC-14-004800

- i. *Vulfrano Perez and James Mercado v. USIG.*, Alameda County Superior Court, Case No. RG15774021
- j. *Laigo v. Life Generations Healthcare LLC.*, Alameda County Superior Court, Case No. RG18890341
- k. *Angel Fraley v. Facebook Inc.*, United States District Court for the Northern District of California, No. C 11-1726 RS
- l. *Matthew Miskimon, David Ortega, and Garry Narron v. Ashbritt Inc.*, Sonoma County Superior Court, Case No. SCV-262302
- m. *Petra Godinez; Jose Rodriguez; Florentino Gayoso v. El Pollo Loco, Inc.*, Santa Clara County Superior Court, Case No. 17CV317828
- n. *Rebecca Lehman & Heather Womick v. Health Net of California, Inc.*, Los Angeles Superior Court, Case No. BC567361
- o. *David Dalao v. LifeHouse Holdings*, Alameda County Superior Court, Case No. RG12660602
- p. *Maria Hernandez v. Golden Gate Equity Holdings, LLC*, San Francisco Superior Court, Case No. CGC-10-505288

3. Personally, I have spent my entire career as a lawyer litigating class and complex actions. Class actions make up the vast majority of my practice area, and I currently lead the complex litigation practice group at The Arns Davis Law Firm. I am also an adjunct professor of law at the University of San Francisco, School of Law, where I designed and taught a class action-focused course last year titled “Litigating Workers’ Rights in the Gig Economy.”
4. I believe that, as co-lead counsel for the California sub-class in this case, The Arns Davis Law Firm is eminently qualified to represent the class. We have considerable experience in complex litigation, including many class action cases, and have achieved in those cases significant benefits for our clients.

1 I declare under the penalty of perjury and under the laws of the United States of America that
2 the foregoing is true and correct. This document was executed on February 23, 2023 in Palo
3 Alto, California.

A handwritten signature in blue ink, consisting of a large, stylized 'S' followed by 'Dharap'.

Shounak S. Dharap